

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In Re: Motion to Quash Subpoena issued to
American Steamship Owners Mutual
Protection and Indemnity Association, Inc.
dated December 17, 2018
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MISC 18-3457

NOTICE OF CROSS-MOTION TO COMPEL RESPONSE TO SUBPOENA

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Briton P. Sparkman, Esq., the exhibits annexed thereto, and the Memorandum of Law, Respondent Pacific Gulf Shipping Co., by and through its attorneys, respectfully moves this Court at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on the 16th day of January at 4:30 p.m., for an Order compelling the American Steamship Owners Mutual Protection and Indemnity Association, Inc. to produce responses to the subpoena *duces tecum* served on December 17, 2018, and granting such other and further relief as it deems just and proper.

Respectfully submitted,

CHALOS & CO, P.C.

Dated: Oyster Bay, New York
January 9, 2019

/s/ Briton P. Sparkman
Briton P. Sparkman, Esq.
55 Hamilton Avenue
Oyster Bay, NY 11771
Tel: (516) 714-4300

Attorneys for Pacific Gulf Shipping Co.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing memorandum was served upon all known counsel of record via ECF on the 9th of January, 2019.

/s/ Briton P. Sparkman
Briton P. Sparkman, Esq.